



Kelly Jones <kellydonovanjones@gmail.com>

Solano v. Kroger - Ms. Solano's testimony re privileged communications

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Counsel,

With respect to Ms. Solano's deposition testimony and plaintiffs' counsel's assertions of privilege at the time, Ms. Solano electronically signed a professional services agreement and electronically communicated with counsel on a laptop at the Gardner House. Plaintiffs' counsel asserted, and re-asserts privilege with respect to these communications. We note that you did not ask in Ms. Solano's deposition whether the document at the Gardner House was signed in hard copy or online. Thus, we do not believe that an errata sheet is necessary on this point. But please let us know if you disagree or have any questions.

Best Regards,

Dan J. Nichols



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